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9 Counsel to TIMOTHY W. HOFFMAN,
10 Trustee in bankruptcy

11 UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SANTA ROSA DIVISION

14 In re
15 FIRST INTERSTATE CONTRACTORS, INC.,
16
17 Debtor(s).

Case No. 20-10381
Chapter 7

18 APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT OF ACCOUNTANT
19 PURSUANT TO SECTION 11 U.S.C. SECTION 327(a)
20

21 TO: THE HONORABLE CHARLES NOVACK,
22 UNITED STATES BANKRUPTCY JUDGE

23 1. TIMOTHY W. HOFFMAN ("Applicant") is the duly appointed, qualified and acting
24 Chapter 7 trustee herein.

25 2. The Applicant deems it to be in the best interest of this estate to employ Bachecki,
26 Crom & Co., LLP, Certified Public Accountants ("Accountant") as the Trustee accountant to
27 prepare and file tax returns and perform tax analysis; to analyze tax claims filed in this case, if
28 necessary; to investigate and analyze for potential recoveries including analysis of potential

1 avoidance issues, if necessary; including to prepare a solvency analysis, if necessary; to testify as
2 to avoidance issues, to prepare wage claim withholding computations and payroll tax returns, if
3 necessary; to serve as Trustee's general accountant and to consult with the Trustee and the
4 Trustee's counsel as to those matters.

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6 3. The accountant has indicated a willingness to perform the services required by the
7 Applicant. The Applicant desires an order authorizing the Trustee to pay the Accountant for
8 services rendered and costs and expenses advanced or incurred in the rendering of such services
9 after a hearing duly noticed to creditors or other parties in interest, the United States Trustee and
10 subject to review for reasonableness by this Court. The normal billing rates for the Accountant
11 are as follows:

12	Partners	\$400-535/hour
13	Senior Accountant	\$250-380/hour
14	Junior Accountant	\$150-240/hour

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16 4. The Applicant has investigated the qualifications of the Accountant. The Applicant is
17 informed and believes, and based thereon allege, that except for the Accountant's employment by
18 the Applicant in unrelated cases, neither the Accountant nor its employees have any connections
19 with the debtor, creditors, or any party in interest, their respective attorneys or accountants, or the
20 United States Trustee or any other person employed by the office of the United States Trustee and
21 that the employment of the Accountant on the conditions set forth herein is in the best interest of
22 creditors.

23 5. To the Applicant's best information and belief, the Accountant does not hold an interest
24 adverse to the estate, and they are disinterested persons as required by 11 USC Section 327(a).

25 6. The Applicant is informed and believes, and based thereupon alleges, that this is proper
26 case for the entry of an order without notice to creditors in that the matters to be ruled upon are
27 purely administrative in nature and any fees paid or to be paid will be subject to Court review
28 after notice and hearing.

1 7. This is the entire agreement of the parties and there is no separate employment
2 agreement.

3
4 WHEREFORE, the Applicant prays that this court make and enter its order:

5 1. Authorizing the Applicant to employ Bachecki, Crom & Co., LLP, Certified Public
6 Accountants, as the accountant in this case;

7 2. Authorizing the Applicant to pay the Accountant services rendered and for the costs
8 and expenses advanced or incurred in the rendering of such services after a hearing duly noticed
9 to the Office of the United States Trustee, creditors and other parties in interest and subject to
10 review for reasonableness by this court, and;

11 3. For such other relief as may be proper.
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13 DATED: July 20, 2020

/S/ Timothy W. Hoffman, Trustee

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15 _____
TIMOTHY W. HOFFMAN, Trustee for the Estate
of FIRST INTERSTATE CONTRACTORS, INC.

16 DATED: July 22, 2020

/S/ Steven M. Olson

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STEVEN M. OLSON
Counsel for TIMOTHY W. HOFFMAN, Trustee
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